



001812-00351-051999

Printed: 07:47:46 Tuesday, 08 Jun, 1999 # 19 / 3231

Systems Integration Group, Inc.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

MAY 19 1999

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

MAY 19 1999

Dr. Judy A. Smith  
Griffin L.L.C.  
P.O. Box 1847  
Valdosta, GA 31603-1847

Dear Dr. Smith:

Subject: Data Review & Labeling Amendments  
Pro-Tex  
EPA Reg No 1812-351  
Your Correspondence Dated September 18, 1998 (Several) & September 29, 1998

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable subject to the following condition. The label must bear the phrase "Restricted Use Pesticide" under the heading "Directions for Use." A stamped copy is enclosed for your records. Please submit one (1) copy of your final printed labeling before you release the product for shipment.

If the condition is not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

For future submissions, three (3) copies of the draft labeling must be included for review. If this condition is not satisfied, it will be considered a deficiency, the review will be discontinued, and the submission will be closed.

Enclosed is also a copy of Agency review dated January 14, 1999 for the Residue Chemistry data (MRID #446670-01) submitted for the subject product. The data reviewed supports the change in the pre-harvest interval (PHI) on the subject product labeling. Copy of

this review had been previously sent to you through the SRRD.

If you have any questions regarding this letter, do not hesitate to contact me at (703) 305-7740 or María I. Rodríguez of my staff at (703) 305-6710.

Sincerely yours,

*(S)*  
Cynthia Giles-Parker  
Product Manager #22  
Fungicide Branch  
Registration Division (7505C)

Enclosure (Label & Review)

**RESTRICTED USE PESTICIDE**

Because of the high acute toxicity of triphenyltin hydroxide and its potential for affecting fetal development, this product may be applied only by certified applicators or persons directly under their supervision.

**PRO-TEX®**

**Active Ingredients:**

Maneb (Manganese Ethylenebisdithiocarbamate) .....	32.63%
(Equivalent to manganese metallic 6.75%)	
Triphenyltin hydroxide .....	4.72%
Inert Ingredients .....	62.65%
Total .....	100.00%

THIS PRODUCT CONTAINS 3.5 LBS. OF MANEB PER GALLON  
AND 0.5 LBS. OF TPTH PER GALLON

**KEEP OUT OF REACH OF CHILDREN**

**ACCEPTED DANGER - PELIGRO**  
with COMMENTS  
In EPA Letter Dated:

5-19-99

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act,  
as amended, for the pesticide  
registered under EPA Reg. No.  
1812-351



note: skull &  
crossbones on  
red background

**POISON**

**STATEMENT OF PRACTICAL TREATMENT**

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand this label, find someone to explain it to you in detail).

IF ON SKIN: Wash with plenty of soap and water.

IF INHALED: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention.

IF IN EYES: Flush with plenty of water. Call a physician.

IF SWALLOWED: Do not induce vomiting. Drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available, drink large quantities of water. Call a physician or Poison Control Center.

For Medical Emergencies involving this product, call toll free 1-800-237-1854

See label for additional precautions and directions for use.

Griffin L.L.C.  
Valdosta, GA 31601

Net Contents 2½ Gallons

EPA Reg. No. 1812-351  
EPA Est. No. 1812-GA-3

## PRECAUTIONARY STATEMENTS

### HAZARDS TO HUMANS (AND DOMESTIC ANIMALS)

#### DANGER - PELIGRO

~~Precautionary statements:~~ Fatal if inhaled. Corrosive, causes irreversible eye damage. May be harmful or fatal if swallowed or absorbed through the skin. Do not get in eyes, or on skin. Do not rub eyes or mouth with hands. Do not breathe vapor or spray mist.

The United States Environmental Protection Agency has determined that triphenyltin hydroxide, one of the active ingredients of this product, affects fetal development in laboratory animals. Exposure to this product during pregnancy should be avoided.

### ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and wildlife. Drift or runoff from treated areas may be hazardous to aquatic organisms in neighboring areas. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Cover or incorporate spills. Do not contaminate water when disposing of equipment washwaters.

### PERSONAL PROTECTIVE EQUIPMENT

Applicators and other handlers must wear:

- Coveralls over long-sleeved shirt and long pants
- Waterproof gloves
- Chemical resistant footwear plus socks
- Protective eyewear
- Chemical-resistant headgear for overhead exposure
- Chemical-resistant apron when cleaning equipment, mixing, or loading

For exposure outdoors:

Dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C)

For exposures in enclosed areas:

A respirator with either an organic vapor-removing cartridge with prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G)

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow the manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

**Engineering controls statements:**

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides (40 CFR 170.240 (d)(4-6)), the handler PPE requirements may be reduced or modified as specified in the WPS.

The closed systems or enclosed cabs must be used in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides (40 CFR 170.240 (d)(4-6)). The handlers PPE requirements may be reduced or modified as specified in the WPS.

Human flaggers must be in enclosed cabs.

**USER SAFETY RECOMMENDATIONS**

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

**DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency response for pesticide regulation.

### AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for protection of agricultural workers on farms, forests, nurseries, and greenhouses and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE), notification to workers and restricted-entry intervals. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 48 hours.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is:

- Coveralls over long-sleeved shirt and long pants
- Waterproof gloves
- Chemical-resistant footwear plus socks
- Protective eyewear
- Chemical-resistant headgear for overhead exposure

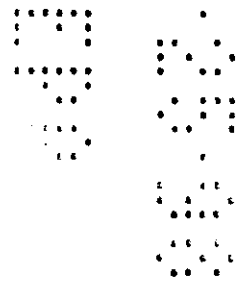
Notify workers of the application by warning them orally and by posting warning signs at entrances to treated areas.

### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

**PESTICIDE DISPOSAL:** Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

**CONTAINER DISPOSAL:** Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities by burning. If burned, stay out of smoke.



## APPLICATION DIRECTIONS

Pro-Tex Fungicide can be applied as a ground or aerial spray to control fungal infestations on listed crops. A mechanical transfer system is required for all mixing and/or loading of this product. A "mechanical transfer system" is defined as a mechanism capable of removing the pesticide from the shipping container and transferring the pesticide into mixing tanks and/or application equipment to prevent worker exposure to the pesticide. A closed system is required for aerial application. The closed system for mixing and/or loading this product must be capable of removing the pesticide from the shipping container, rinsing the container and transferring the pesticide and rinsate into mixing tanks and/or application equipment. Application rates are for general use and must not be exceeded. The state agricultural extension or agricultural experiment station specialists should be consulted for specific applications and timing recommendations. With any spray application thorough coverage is essential for good control. Do not apply this product through any type of irrigation system except for use on potatoes. See chemigation information below.

### MAXIMUM SEASONAL POUNDAGE WHEN USED IN CONJUNCTION WITH ONE OR MORE EBDC PRODUCTS.

#### FOLIAR APPLICATIONS

##### Where EBDC Products Used Allow the Same Maximum Poundage of Active Ingredient Per Acre Per Season

If more than one product containing an EBDC active ingredient (maneb, mancozeb, or metiram) is used on a crop during the same growing season and the EBDC products used allow the same maximum poundage of active ingredient per acre per season, then the total poundage of all such EBDC products used must not exceed any one of the specified individual EBDC product maximum seasonal poundage of active ingredient allowed per acre.

##### Where EBDC Products Used Allow Different Maximum Poundage of Active Ingredients Per Acre Per Season

If more than one product containing an EBDC active ingredient is used on a crop during the same growing season and the EBDC products used allow different maximum poundage of active ingredients per acre per season, then the total poundage of all such EBDC products used must not exceed the lowest specified individual EBDC product maximum seasonal poundage of active ingredient allowed per acre.

#### SEED TREATMENT

In addition to the maximum number of foliar applications permitted by the formula stated above, a single application of seed treatment may be made on crops which have registered seed treatment uses.

Apply this product only as specified on this label.



### GENERAL CHEMIGATION INSTRUCTIONS

Apply this product only through one or more of the following types of systems: sprinkler including center pivot, lateral move, end tow, side (wheel) roll, traveler, big gun, solid set, or hand move irrigation system(s). Do not apply this product through any other type of irrigation system.

Crop injury, lack of effectiveness, or illegal pesticide residues in the crop can result from nonuniform distribution of treated water.

For specific information about calibration, contact State Extension Service specialists, equipment manufacturers or other irrigation experts.

Do not connect an irrigation system used for pesticide application to a public water system unless the pesticide label-prescribed safety devices for public water systems are in place.

A person knowledgeable of the chemigation system and responsible for its operation or under the supervision of the responsible person, shall shut the system down and make necessary adjustments should the need arise.

Posting of areas to be chemigated is required when 1) any part of a treated area is within 300 feet of sensitive areas such as residential areas, labor camps, businesses, day care centers, hospitals, in-patient clinics, nursing homes or any public areas such as schools, parks, playgrounds, or other public facilities not including public roads, or 2) when the chemigated area is open to the public such as golf courses or retail greenhouses.

Posting must conform to the following requirements. Treated areas shall be posted with signs at all usual points of entry and along likely routes of approach from the listed sensitive areas. When there are no usual points of entry, signs must be posted in the corners of the treated areas and in any location affording maximum visibility to sensitive areas. The printed side of the sign should face away from the treated area towards the sensitive area. The signs shall be printed in English. Signs must be posted prior to application. ~~and must remain posted until foliage has dried and soil surface water has disappeared~~ Signs must remain posted for the duration of the restricted entry interval. ~~Signs may remain in place indefinitely as long as they are composed of materials to prevent deterioration and maintain legibility for the duration of the posting period.~~ Signs must be composed of materials that prevent deterioration and maintain legibility across the restricted entry interval and the duration of posting

All words shall consist of letters at least 2 1/2 inches tall, and all letters and the symbol shall be a color which sharply contrasts with their immediate background. At the top of the sign shall be the words KEEP OUT, followed by an octagonal stop sign symbol at least 8 inches in diameter containing the word STOP. Below the symbol shall be the words PESTICIDES IN IRRIGATION WATER. This sign is in addition to any sign posted to comply with the Worker Protection Standard.

### SPRINKLER CHEMIGATION

The system must contain a functional check valve, vacuum relief valve, and low pressure drain appropriately located on the irrigation pipeline to prevent water source contamination from backflow.

The pesticide injection pipeline must contain a functional, automatic, quick-closing check valve to prevent the flow of fluid back toward the injection pump.

The pesticide injection pipeline must contain a functional, normally closed, solenoid-operated valve located on the intake side of the injection pump and connected to the system interlock to prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down.

The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops.

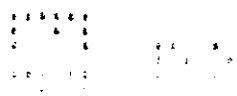
The irrigation line or water pump must include a functional pressure switch which will stop the water pump motor when the water pressure decreases to the point where pesticide distribution is adversely affected.

Systems must use a metering pump, such as a positive displacement injection pump (e.g., diaphragm pump) effectively designed and constructed of materials that are compatible with pesticides and capable of being fitted with a system interlock.

Do not apply when wind speed favors drift beyond the area intended for treatment.

When mixing, fill nurse tank half full with water. Add PRO-TEX slowly to tank while hydraulic or mechanical agitation is operating and continue filling with water. Stickers, spreaders, insecticides, nutrients, etc. should be added last. If compatibility is in question, use the compatibility jar test before mixing a whole tank. Because of the wide variety of possible combinations which can be encountered, observe all cautions and limitations on the label of all products used in mixtures.

PRO-TEX should be added through a traveling irrigation system continuously or at the last 30 minutes of solid set or hand moved irrigation systems. Agitation is recommended.



## GENERAL INSTRUCTIONS FOR APPLICATION

CROP	DISEASE	QTS/ACRE	USE INSTRUCTIONS
Potatoes	Early Blight, and Late Blight	0.75 - 1.5	<p>GENERAL: Applications should begin with the appearance of blight weather conditions and continue on a seven (7) day schedule. The lower rate of application should be used early in the season and the high rate mid to late season or when blight infection is in the area. Do not apply within 7 days of harvest in the following states: CT, DE, FL, ME, MI, NH, NY, OH, PA, RI, VT, and WI. In all other states, do not apply within 2+ 14 days of harvest. Do not exceed 6 QTS/A per growing season. It is recommended that this product be used with an INTEGRATED PEST MANAGEMENT PROGRAM. Vine kill should occur 14 days before harvest.</p> <p>GROUND: (Closed Cabs Only) Apply in at least 15 gallons of water. Full coverage of the foliage is necessary for the best results. Diluted spray should be directed uniformly to all parts of the plant and the gallonage increased according to the size of the plants.</p> <p>AERIAL: Apply in 3-to10 gallons of water. For helicopter application fly high enough so as not to whip the vines.</p>
Sugar Beets	Cercospora Leafspot	1.0 - 1.8	<p>GENERAL: Use the lower gallonage when plants are small and increase volume with plant size. Use the lower rate for protective sprays and the higher rates later in the season or during high infection periods.</p>

Application should begin when leafspot conditions appear or when the disease is in the area. Repeat at 10- to 14 day intervals. Do not treat within 21 days of harvest. Do not exceed 6 QTS/A per growing season. Do not graze or feed treated beet tops to livestock.

GROUND: (Closed Cabs Only) Apply in at least 15 gallons of water. Full coverage of the plant is necessary for best results.

AERIAL (helicopter or fixed wing aircraft): Apply in 5- to 10 gallons of water.

#### WARRANTY STATEMENT

GRIFFIN warrants that this product conforms to the chemical description on the label thereof and is reasonably fit for purposes stated on such label only when used in accordance with directions under normal use conditions. It is impossible to eliminate all risks inherently associated with use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or applications, all of which are beyond the control of GRIFFIN. In no case shall GRIFFIN be liable of consequential, special or indirect damages resulting from the use or handling of this product. All such risks shall be assumed by the Buyer. The exclusive remedy of any buyer or user of this product for any and all losses, injuries, or damages resulting from or in any way arising from the use, handling, or application of this product, whether in contract, warranty, tort, negligence, strict liability, or otherwise, shall not exceed the purchase price paid for this product or at GRIFFIN'S election, the replacement of this product. GRIFFIN MAKES NO WARRANTIES OF MERCHANTABILITY OR FITNESS FOR PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

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